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July 5, 2021

By ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Randy Torres, et al
Criminal Docket No. 16-809 (VM)

Dear Judge Marrero:

The undersigned represent Charles Ventura in the above referenced matter. Mr. Ventura and co-defendants, Randy Torres and Walston Owen, are scheduled to be sentenced on July 30, 2021. On behalf of all defense counsel and with the consent of the three defendants, we respectfully request a 30 day adjournment of the sentencing date (defense counsel is unavailable on: August 20, August 25 and September 3). The nature of the convictions requires an in-person sentencing hearing.

Public health concerns and jail restrictions related to Covid-19 have hindered meetings with clients and delayed the gathering of records necessary for the sentencing. Now that many of those Covid-19 restrictions have eased the defense is confident a 30 day adjournment is sufficient time to proceed with sentencing.

We have discussed this request with the government and it graciously consents to a 30 day adjournment of the sentencing date. Though, to be sure the government would like the sentencing to proceed at the earliest possible date and prefers a date in late August.

Dated: New York New York
July 6, 2021

Respectfully submitted,
By: /s/ Christopher Wright
Christopher Wright, Esq.
/s/ John Burke
John Burke, Esq.